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July 1, 2015

Honorable Joseph A. Dickson  
U.S. District Court, District of New Jersey  
Martin Luther King Jr. Federal Building  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Bedoya v. American Eagle Express, Inc.*  
No. 2:14-cv-02811-ES-JAD

Dear Judge Dickson:

AEX is a small company with a small management team. Within this management team, counsel works with two individuals to finalize and compile information responsive to discovery requests: John D. Gamble (AEX's Chief Executive Officer) and Mike Maenner (AEX's Director, Security & Compliance). Throughout the time period of June 12-26, both Mr. Gamble and Mr. Maenner experienced significant personal hardships that prevented a dialogue with counsel necessary to complete AEX's answers to Plaintiff's interrogatories. Counsel respectfully requests the Court's leave to not disclose those personal issues within a public filing, but will discuss them with the Court as the Court deems necessary. The dialogue between counsel, Mr. Gamble, and Mr. Maenner to finalize interrogatory answers ultimately revealed AEX's legitimate concerns about the accuracy of many of the draft interrogatory answers that counsel had prepared.

AEX has now served the verified interrogatory answers that it was unable to serve by the June 19, 2015 deadline. AEX continues compiling documentation responsive to one of the requests contained within Plaintiffs' Requests for Production (Request #10). AEX appreciates Plaintiffs' counsel's professional courtesy in consenting to a number of extensions of deadlines and apologizes to counsel that it was unable to meet the last one. Counsel will endeavor to work with Plaintiffs' counsel to ensure they obtain all necessary discovery.

The Honorable Joseph A. Dickson  
July 1, 2015  
Page 2

Very truly yours,

/s Jason D. Stitt

Jason D. Stitt of  
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JDS